

See conclusion Page 1. & 2.

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee



KNOXVILLE Division

Mr. Rex Allen Moore

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

STATE OF TNN ATTY. GENERAL JONATHAN SKRM,
T.D.O.C./B.O.P.P. Mr. JOHNNY CALDWELL, ET AL.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

3:24-cv-197

(to be filled in by the Clerk's Office)

Varlan / Poplin

Jury Trial: (check one)



Yes



No

RECEIVED

MAY 02 2024

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Mr. Rex A. Moore,		
Address	2112 Washington Avenue		
	Knoxville	TN	37917
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Knox County		
Telephone Number	(865) 250-1818		
E-Mail Address	N/A		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Jonathan Skrmetti		
Job or Title (if known)	State of Tenn Government Office of Atty. General		
Address	500 Charlott Avenue		
	Nashville	Tn	37219
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Davidson Co.(615) 741-2009		
Telephone Number			
E-Mail Address (if known)			

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name	Mr. Frank Strada,		
Job or Title (if known)	Tennessee Dpt. of Correction Commissioner		
Address	320 Sixth Avenue North		
	Nashville	TN	37423
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Davidson Co.		
Telephone Number	(615) 741-1000		
E-Mail Address (if known)			

☐ Individual capacity ☒ Official capacity

Defendant No. 3

Name Bill Lee,
 Job or Title *(if known)* State of TN Gov.
 Address 600 Dr. Martin L. King Jr. Blvd.
Nashville Tn 37243
City State Zip Code
 County Davidson County
 Telephone Number (615) 741-2001
 E-Mail Address *(if known)* _____

☐ Individual capacity ☒ Official capacity

Defendant No. 4

Name M r. Johnny Caldwell,
 Job or Title *(if known)* State of Tennessee Dpt. of correction Law enforcement P/O
 Address 1426 Elm St.
Knoxville TN 37921
City State Zip Code
 County Knox Co.
 Telephone Number (865) 582-2000
 E-Mail Address *(if known)* _____

☒ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

- ☐ Federal officials (a *Bivens* claim)
☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

U.S. & or State Const. 1st, Amnd. *Bivens*, Religious-Retaliation regs, 5th, 8th, 14th Amnd., T.C.A., & TN Rule Regs., _____ Conduct Statute, For Gov. Uniform Administration Procedure Act. violation suite.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

See sec (B) above, State defendant's.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Each Defendant Deprived me of Uniform Administration Procedure Act. by State T.D.O.C./B.O.P.P. Grievance complaint review report, & response, for religious civil rights, State trial crim court's pre-filed sovereign immunity review request, for federal jurisdiction see crim court testimony. T.D.O.C./B.O.P.P. supervisor Officer Mr. Caldwell's,, Official misconduct, to Rule Reg & TCA regs, while conduct. using unreported favors, & family harrassment, by threat's, Near 5-15-24 to maintain my state probation.

III. Statement of Claim

P/O Caldwell then threatened my poor old near 80 year old mother & lived at her home saying loudly, madly i quote. You know mr. Moor's not been sleeping here while she cryed in her chair trembling in Fear.

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
Each defendant Act of said are report, & unreported violation are official capacity claims from Uniform Administration Procedure Act. from Office conduct, See application part (B). other than individual cap. Mr. Caldwell, at 6866 september Ln. Knoxville Tn 37924. threats from my family's home upon B.O.P.P. reandum home visit .

- B. What date and approximate time did the events giving rise to your claim(s) occur?

see dates in part (2), box (D). above

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See part II. box (B) above, Uniform Admin. Procedure Act. Facts & defendant's Official & Individual cap. claims.said.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

My sustaining, Wrongful, Cruel, & Unusual Punishment / Pretrial Jail Detainment.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

see Religious Restoration Act of 1993,
Pub. L. No. 103-141, 107 Stat. 1488 (November 16, 1993, codified at 42 U.S.C. 2000bb through 42 U.S.C. 2000bb-4 (also known as RFRA, Pronounced "rifra(1), Fed law

(One Official Capacity Claim (\$10,000,000,00 Ten Million Dallars, Uniform Adinistration Procedure Act.
Requested amount for - Freedom from punitive, & Religious, Civil Right's deprivation. No less than Seventy five thousand thousand dollars\$ 75,000,00.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5-2-2024

Signature of Plaintiff

Printed Name of Plaintiff

Rex Moore
Rex Moore

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Rex A. Moore
2112 Washington Ave
Knoxville TN 37917

CONCLUTION

The claims this case are Official capacity deprivation from the state of Tennessee, Criminal trial court, & Dpt. Of Correctional, Gov. service, under Uniform Administration Procedure Act. as followed:

(1).(subject's for review)

Relivance: for Constitutional/Jurisdictional Issue.

(2). (Subject) Trial testimony Evidence, cause for violation/Revocation.

(3). Review Purjury/Warrant Affidavit.

(4). Relivance: for T.C.A. 40-35-308.

(5). Exhibit T.D.O.C./B.O.P.P. Grievance Complaint Review Relivent.

(6). *see thumb Drive Exhibit Testimony in case # 3:23-cv-196* ^{→ evidence}

CONCLUSION

The conclusion to this case requested from the plaintiff are the simple review of five simple matte/issue for disposition followed:

(1).

(Subject) Trial court testimony :

(a)

Whether defendant made reports of perjury under trial court testimony?

(b)

Whether defendant filed a false affidavit arrest warrant for V.O.P. violation for revocation under perjury ?

©

Whether defendant Caldwell, could or should have made favor, with the plaintiff, while maintaining his probation, by this cause, based on his V.O.P. as said in trial court testimony, vs. his declined act for petitioner probation offender's request for privilege, to comply with T.C.A. 40-35-308. probation modified condition?

(d)

Defendant Mr. Caldwell, maintained a such long 5. month favor, authorizing S.O.R. sex offender registration plaintiff, Mr. Rex Moore, access by favor, while establishing state probation completion in this registered sex offender, prohibited violation zone, address of his wife, of state law reg; without pre-trial court formal notice, information upon the record?

(2)

(a).

Prior to the defendant, Mr. Caldwell's, S.O.R. trial court V.O.P. testimony, on behalf of the state, this Petitioner, had an outstanding/pending complaint for violation of religious civil rights, with pre-filed T.D.O.C./B.O.P.P. formal grievance complaint, Vs. act. of defendant, & Party.

(b).

This petitioner, Mr. Moore, contested while a pre-trial filed recorded sovereign citizen of true birth, decline to report to the state probation office on Sunday's, as stated, upon request, for thus one day, religious right to worship, as requested in that grievance complaint. This petitioner's, requested grievance resolution for alternative P/O supervising regulator, was declined

(c).

Mr. Caldwell, by Uniform administration/procedure act., & State of Tn. Gov., & State Dist. Atty. General's Office, State trial court, & T.D.O.C. /B.O.P.P. /Dpt. of Correction's Staff agreement, authorized the affidavit without timely objection, nor stating cause for Violation for state Probation & or S.O.R. Sex Offender registration Violation, The defending party was act's; of retaliation by cause of petitioner's religious grievance, worship claim's, & his follow up V.O.P. & _____ testimony. Where no state laws were violated by the plaintiff petitioner exist !

